

ORIGINAL

Before The
Federal Communications Commission
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED

DEC 17 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

COMMENTS ON MSTV PROPOSED DTV TABLE OF ALLOTMENTS

Prairie Public Broadcasting, Inc. ("Prairie"), licensee of noncommercial educational television stations throughout North Dakota forming that state's public television network, by its counsel, provides these comments on the modified DTV table of allotments, as proposed by the "Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments Submitted by the Association for Maximum Service Television, Inc. and Other Broadcasters," filed November 20, 1997 (the "MSTV Submission").^{1/} Prairie is sympathetic to the concerns underlying MSTV's proposed changes in the table and generally supports those changes that are of benefit to public broadcasters, as set forth in the separate filing by the Association of America's Public Television Stations and the Public Broadcasting Service ("APTS/PBS").

^{1/} By Public Notice dated December 2, 1997, the Commission provided until December 17, 1997, for interested parties to comment on the MSTV Submission.

No. of Copies rec'd
List ABCDE

004

Prairie also specifically supports two particular allotment changes proposed by MSTV in the table--the substitution of DTV Channel 23 for Channel 39 as the paired digital allotment for noncommercial educational television station KFME, Fargo, North Dakota, and of DTV Channel 28 for Channel 57 as the paired digital allotment for noncommercial educational television station KSRE, Minot, North Dakota.

On June 13, 1997, Prairie filed a petition for reconsideration, taking issue with the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"), insofar as it allotted DTV Channel *39 to Station KFME(TV), Fargo, North Dakota, because that allotment would result in substantial areas of interference from adjacent DTV Channel 38, allotted to KXJB(TV), Valley City, North Dakota. Prairie also requested reconsideration of the allotment of DTV Channel *56 for Station KGFE-TV, Channel *2, Grand Forks; DTV Channel *57 for Station KSRE(TV), Channel *6, Minot; DTV Channel *51 for KWSE(TV), Channel *4, Williston; and DTV Channel *22 for Station KBME(TV), Channel *3, Bismarck, all in North Dakota. Finally, Prairie objected to the lack of demonstrated commitment on the part of the Commission to provide specific, protected DTV allocations to substitute for now-deleted vacant noncommercial educational NTSC assignments. Prairie mentioned in particular the need to provide reserved DTV allotments for Devils Lake, North Dakota and Crookston, Minnesota.

As noted, the proposed MSTV table suggests a resolution to Prairie's concerns about KFME by allotting DTV Channel 23, thus resolving the adjacent channel

interference problem. The MSTV table also proposes to modify the KSRE DTV allotment to Channel 28, which is within the core. So far as Prairie can determine, these changes can be made without resulting in any significant reduction in coverage for existing NTSC stations or in replication by DTV facilities. Prairie therefore supports these proposed changes.

For these reasons, Prairie supports the MSTV Submission to the extent that its suggested changes generally benefit public broadcasters, and it proposes the substitution of DTV Channel 23 for Channel 39 for KFME, and DTV Channel 28 for Channel 57 for KSRE. Prairie also urges the Commission to accommodate the other technical concerns raised by Prairie in its previous submissions.

Respectfully submitted,

PRAIRIE PUBLIC BROADCASTING, INC.

By: Todd D. Gray
Todd D. Gray
Its Attorney

Dow, Lohnes & Albertson, pllc
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
202-776-2571

December 17, 1997

CERTIFICATE OF SERVICE

I certify that I have this 17th day of December, 1997, served copies of the foregoing "Comments on MSTV Proposed DTV Table of Allotments" by First Class U.S. Mail or by hand delivery upon the following:

Richard M. Smith*
Chief, Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W.
Washington, D.C. 20554

Clay Pendarvis, Esq.*
Chief, TV Branch
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Jonathan D. Blake, Esq.
Ellen P. Goodman, Esq.
Covington & Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044-7566
Counsel for MSTV



*denotes service by hand delivery